

EXHIBIT A

Supreme Court of Pennsylvania

Court of Common Pleas
Civil Cover Sheet

DAUPHIN

County

For Prothonotary Use Only:

Docket No:

TIME STAMP

The information collected on this form is used solely for court administration purposes. This form does not supplement or replace the filing and service of pleadings or other papers as required by law or rules of court.

S E C T I O N A	Commencement of Action: <input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Writ of Summons <input type="checkbox"/> Petition <input type="checkbox"/> Transfer from Another Jurisdiction <input type="checkbox"/> Declaration of Taking	
	Lead Plaintiff's Name: RAJIKARUNANAYAKA	Lead Defendant's Name: THE HERSHEY COMPANY (pls. refer to attachment 1)
	Are money damages requested? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Dollar Amount Requested: <input type="checkbox"/> within arbitration limits (check one) <input checked="" type="checkbox"/> outside arbitration limits
	Is this a Class Action Suit? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Is this an MDJ Appeal? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Name of Plaintiff/Appellant's Attorney: _____ <input type="checkbox"/> Check here if you have no attorney (are a Self-Represented [Pro Se] Litigant)	

S E C T I O N B	Nature of the Case: Place an "X" to the left of the <u>ONE</u> case category that most accurately describes your PRIMARY CASE . If you are making more than one type of claim, check the one that you consider most important.		
	TORT (do not include Mass Tort) <input type="checkbox"/> Intentional <input type="checkbox"/> Malicious Prosecution <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Nuisance <input type="checkbox"/> Premises Liability <input type="checkbox"/> Product Liability (does not include mass tort) <input type="checkbox"/> Slander/Libel/ Defamation <input type="checkbox"/> Other: _____	CONTRACT (do not include Judgments) <input type="checkbox"/> Buyer Plaintiff <input type="checkbox"/> Debt Collection: Credit Card <input type="checkbox"/> Debt Collection: Other _____ <input type="checkbox"/> Employment Dispute: Discrimination <input checked="" type="checkbox"/> Employment Dispute: Other Creating a hostile work environment <input type="checkbox"/> Other: _____	CIVIL APPEALS Administrative Agencies <input type="checkbox"/> Board of Assessment <input type="checkbox"/> Board of Elections <input type="checkbox"/> Dept. of Transportation <input type="checkbox"/> Statutory Appeal: Other _____ <input type="checkbox"/> Zoning Board <input type="checkbox"/> Other: _____
	MASS TORT <input type="checkbox"/> Asbestos <input type="checkbox"/> Tobacco <input type="checkbox"/> Toxic Tort - DES <input type="checkbox"/> Toxic Tort - Implant <input type="checkbox"/> Toxic Waste <input type="checkbox"/> Other: _____	REAL PROPERTY <input type="checkbox"/> Ejectment <input type="checkbox"/> Eminent Domain/Condemnation <input type="checkbox"/> Ground Rent <input type="checkbox"/> Landlord/Tenant Dispute <input type="checkbox"/> Mortgage Foreclosure: Residential <input type="checkbox"/> Mortgage Foreclosure: Commercial <input type="checkbox"/> Partition <input type="checkbox"/> Quiet Title <input type="checkbox"/> Other: _____	MISCELLANEOUS <input type="checkbox"/> Common Law/Statutory Arbitration <input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Mandamus <input type="checkbox"/> Non-Domestic Relations <input type="checkbox"/> Restraining Order <input type="checkbox"/> Quo Warranto <input type="checkbox"/> Replevin <input type="checkbox"/> Other: _____
	PROFESSIONAL LIABILITY <input type="checkbox"/> Dental <input type="checkbox"/> Legal <input type="checkbox"/> Medical <input type="checkbox"/> Other Professional: _____		

Updated 1/1/2011

**IN THE COURT OF COMMON PLEAS OF DAUPHIN COUNTY
CIVIL DIVISION**

<u>RAJIKA KARUNANAYAKA</u> <div style="text-align: right;">Plaintiff(s)</div>	<div style="text-align: center;">Docket Number</div>
VS.	
<u>THE HERSHEY COMPANY</u> <u>Please refer to exhibit 1 for specific names</u> <div style="text-align: right;">Defendant(s)</div>	

COMPLAINT

1. Plaintiff(s) is (are) **Rajika Karunanayaka** with an address of **613 Old W Chocolate Avenue, Hershey PA 17033.**

2. Defendant(s) is (are) **Hershey Company (pls see exhibit 1)**
with an address of **19E Chocolate Avenue, Hershey, PA 17033**

3. Complaint:

Given the circumstances of this case, I realize that it would be best handled by an attorney. I did make an effort to hire a lawyer but all of my requests were either denied or not responded to. I strongly believe my efforts were blocked by the police/FBI and the Hershey Company given the severity of this case. As the statute of limitations was fast approaching I decided to submit the complaint myself.

Please refer to:

1. Complaint Summary
2. Exhibit 1 where I have detailed the history and circumstances of how this unfolded. It is a lot of detail but I believe the level of detail is necessary for this.
3. Exhibit 2 - my email communication with the company

COMPLAINT SUMMARY

This document very briefly attempts to summarize my experiences of harassment and intimidation at Hershey Company, leading to my involuntary resignation, and outlines a conspiracy involving company employees, law enforcement and my ex-husband to oust me from the Hershey Company. Please refer to exhibit 1 for a more detailed account.

Employment History and Expertise at Hershey

I, Rajika Karunanayaka was employed at the Hershey Company in very good standing as a Senior Manager, Analytics for nearly 15 years. While I worked on many types of analytical work, I specialized in Marketing Mix Modeling (MMM) which measures the effectiveness of company's media investments.

I was recognized as a resident expert in Marketing Mix Modeling (MMM). Since 2018, I was solely responsible for MMM work for over 13 brands (which used to be done by 4 people prior to that). The 13 brands amounted to a total media investment of approximately \$0.5 billion annually.

Involuntary Resignation Due to Harassment

I resigned from The Hershey Company on November 11, 2024, due to severe harassment and intimidation, which I initially believed to be racially motivated. After I resigned I found out that it was more than that and my ex-husband conspired with company executives and law enforcement to create a hostile work environment leading to my resignation. Instead of discontinuing my employment by offering a severance package in the company wide re-organization effort in September 2024, they created a situation for me to resign on my own.

I uncovered a broader conspiracy involving multiple employees and executives at the Hershey company, which was orchestrated to force my resignation. I have detailed various incidents that suggest a coordinated effort to intimidate and discredit me in Exhibit 1 which describes incidents of intimidation and harassment.

The company stepped outside of its boundaries and interfered in my personal matters relating to my ex-husband and our divorce.

Though the intimidation and harassment was caught on company video/camera footage, the company refused to acknowledge occurrence of such events. Despite my many requests to release the original/unedited footage and my offer to personally pay for any costs (time) associated with un-archiving of the footage, they refused saying an objective and thorough review was carried out and they did not find anything.

I involuntarily resigned on November 11, 2024 due to their refusal to acknowledge severe harassment, intimidation, and stalking taking place on company premises. The reason for the refusal to release the footage was because the perpetrators were caught on footage.

Specific Incidents of Harassment and Intimidation

I can recount numerous specific incidents of harassment, including being followed, targeted in the gym, and subjected to staged situations designed to trap and fault me. I felt my safety was compromised and reported these incidents to local law enforcement too but no action was taken.

Honey Traps and Manipulative Tactics

Various manipulative tactics/traps/baits were used against me, including a honey trap set up in the gym by the company to discredit me. I must admit that I partially fell for this trap. I believe these tactics were part of a larger scheme to portray me negatively and justify my dismissal.

Emotional and Psychological Impact

The events surrounding this resignation have had a profound emotional and psychological impact on me,

Company Culture and Ethical Violations

The company violated its own principles of ethics and integrity and note the irony of being subjected to unethical treatment in a company that emphasizes these values.

I express my utmost disappointment in the company's failure to uphold its stated values.

Wherefore, Plaintiff requests this Court_____

1. For The Hershey company to release any and all camera footage which contains the evidence pertaining to the alleged harassment/intimidation and related incidents.
 - a. Original/unedited camera footage of the company gym in its entirety (including the 2 classrooms, front desk, etc.) from January thru November 11, 2024
 - b. Original/unedited camera footage that was put in the area near my cube unbeknownst to me
2. For The Hershey company to give me the same package as the Voluntary Separation Package (VSP) offered back in 2016 which I had opted for, but the company then asked me to stay back
3. Compensation for Extreme Intentional emotional trauma/distress caused to me (I have not been able to see a therapist due to lack of job/insurance

Rajika Karunanayaka

Signature

Rajika Karunanayaka

Print

VERIFICATION

I, **Rajika Karunanayaka**, verify that the statements made in this Complaint are true and correct to the best of my knowledge, information, and belief. I understand that the statements herein are made subject to the penalties of 18 Pa C.S.§4904 relating to unsworn falsification to authorities.

Rajika Karunanayaka

Petitioner

5/9/2025

Date

**IN THE COURT OF COMMON PLEAS OF DAUPHIN
COUNTY CIVIL DIVISION**

Rajika Karunanayaka

No. _____

vs.

:
:
:
:

Form of Action

CIVIL ACTION - Complaint

The Hershey Company

pls. see Exhibit 1 for more details

NOTICE

YOU HAVE BEEN SUED IN COURT. If you wish to defend against the claims set forth in the following pages you must take action within twenty (20) days after this complaint and notice are served by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE GO TO OR TELEPHONE THE OFFICES SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

**DAUPHIN COUNTY LAWYER REFERRAL SERVICE
213 North Front Street
Harrisburg, PA 17101
(717) 232 -7536**

EXHIBIT 1

There is a lot of detail here but I believe that level of specificity is important to explain the full context of the situation I faced. In fact, there's more than this but I will limit it to this.

I was employed as Senior manager-Analytics of very good standing at the Hershey Company for almost 15 years, having earned the respect of many and considered to be the resident expert in Marketing Mix Modeling (aka MMM). To put it simply, MMM attempts to statistically isolate the sales impact of media investments to be able to measure effectiveness and Return on Investment (ROI) of it.

From 2018 to 2024, I was solely responsible for MMM work for ALL brands (>13) that had decent level of media investment (totaling to approximately \$0.5Bn that the company made annually on both Sweets and Salty brands).

On 11/11/24 I involuntarily resigned from the company due to my utmost dismay and disappointment over how the company handled my complaint regarding severe harassment/intimidation/stalking by some employees. I attribute this action of theirs of not giving me the same fair treatment that they would've afforded to an American (especially a Caucasian) to be race related but there is more to this. I had initially thought that this was an isolated incident but since my resignation I've sadly uncovered that this was part of a much larger plot involving a lot more people/entities, spanning a number of years.

Essentially, the Hershey company stepped way out of its boundaries and got involved in a personal matter that they shouldn't have.

My now ex-husband and I were going through a bitter divorce. Hershey is a very small town built around the Hershey Company and everyone pretty much knows everyone. He (Prasanna Karunanayaka) is employed as a professor at the Hershey Medical Center. During our heated fights he threatened to destroy me and said he will reach out to my company as well as my manager, Charlie Chappell at the time. I thought he said it in the heat of the moment but to my surprise he followed through on that. He got through to the highest of the highest at the Hershey Company via mutual contacts as well as the Derry Township police department/FBI and together they created a situations/traps/baits to force me to fault and make me uncomfortable and then get me to resign from the company.

They staged many scenes, traps, baits physically in-office premises as well as via cyber/phone to lure/bait/trap me so that they could then fault me and subsequently get rid of me without compensation.

As an act of vengeance, my ex-husband went around and spread that I have bad morals, that I am very cheap, and that I am making bad remarks about Hershey company leadership/executives/colleagues etc. He hated my mother and cursed her to death many times. I had accused him of stealing (based on some experiences I had with him) and he wanted to get back at me for all of this. So, he got through to law

enforcement including the local Derry township police department/FBI as well as the Hershey company executives (via mutual contacts) to get back at me. They tried to lure/bait me into making bad remarks about leadership/executives/colleagues while in office, lure me in to taking stuff, weave things happening in my home front and what my ex was accusing me of, in to their personal stories.

After I resigned from the company I pieced the full puzzle together that this was not an incident isolated to the gym.

Below are names of some folks at the Hershey Company that I can recall were involved...there were many other employees whose names I don't know or don't recall. The CEO (Michelle Buck), CHRO (Chris Scalia), CGO (Kristen Riggs), Senior executives (Charlie Chappell, Ed Edson, Dan Mohnshine, Ryan Riess, Vinny Rinaldi, Kyle Shank, Jack Wilder, Emilie Thomas, Todd Ferris etc.), my colleagues in the media team (Yuan Sheu, Bruce Knowles, Damian Mahaffey, Amit Chillar, Carly Sachs, Rachel Benson, Stephanie Hemann, Conor Minnick, Alison Martin, Jamie Weaver, etc., and many other employees (Kevin McCollum, Brenda Lynn, David Smith, Irma Nugroho, Mike Pacewicz, Tammy Barry, Cindy, Prakash Patil, Tracy Derr, Kathy Barach, Nathan Forney, Jennifer Amato, Luke Cuculis, Krista Anderson, Gavin Hower, HR etc.), Retirees (Diana Dodds, Sue Ann, Marybeth Rochi, Emily Grun, Ramona Marlin, Mark, Carol and many more), NIFS/fitness center employees (Karen Kloss, Gabriel Fitser, Casey McNew, Koby Conz) were involved in this act towards me.

Below is a brief background on the trigger for my involuntary resignation: In September of last year (2024) I had gone to Sri Lanka for a family Emergency. Upon my return I resumed going to the on-premise gym as usual. There were many incidents that had made me quite uncomfortable mostly involving the manager of the gym, Karen Kloss. I then started noticing that I was being followed mostly after gym/work to where ever I went, by retirees who frequented the gym as well as other folks I couldn't necessarily recognize. It got so bad, that I had to make sudden lane changes, swerve to avoid them but it only got worse. I would also take different routes just to avoid them but no matter what, they'd follow me at which point I started fearing for my life. This happened over a few weeks.

On Tuesday 10/22/25, I left office early around 2:45pm just to see if I'd be followed again, and sure enough, I was being followed yet again. On the spur of the moment, I decided to take the route by the police station and pulled in to the parking lot. I asked the officer on duty at the time, on how to file a complaint as if I was asking for a friend. This was the VERY FIRST time such a thing had happened to me in my 25+ years of residence in the USA. So this was unfamiliar territory for me and I was honestly nervous. Part of me also thought that the intimidation/harassment I was being subjected to, would come to an end when they saw me go to the police station but I was totally wrong on that.

Earlier in the summer too I had noticed some girl who was working out in the gym following me but I thought it was a one off occasion and just ignored it.

The next day (Wednesday 10/23/25) when I went to the lunch time class which is conducted by the fitness center manager, the unthinkable happened. I always stand on the RHS (Right Hand Side) of the classroom for this class (there's unofficially assigned spots cos most are regulars in this class). There's a HSY employee (Kathy Barach) who is a good friend of the fitness center manager who always stands in front of me (closer to the RHS door) in that class but just that day she happened to stand behind me in spite of her usual spot in front me being open/available which I thought was odd...so I ended up being closest to the door and could be easily seen from the corridor outside the door (which is kept opened for that class). While doing the class, I saw from the mirror a retiree wearing a cap pointing me to another person in black. The retiree was standing at an angle and not right in front of the door but because of the mirrors I could see him but he obviously didn't see me. The person in black was on the shorter side with a big tummy, wearing black shorts, black t-shirt, black cap and wearing a black blue

tooth device on his ear then he kept pacing outside of that door giving me stares and talking and nodding his head in a threatening/intimidating manner (he resembled just like a hit man and there was zero doubt in my mind that it was done to scare me cos they knew that I had gone to the police station the previous day). This person is also not an employee of the company.

That day just to show that I wasn't intimidated by these things, I went to another class that afternoon at 5pm. The fitness center manager was super surprised to see me.

I noticed that there was no intimidation that afternoon cos she was not prepared for my arrival. After the class, I went upstairs again and started doing some work that I wanted to wrap up before I went home.

When I left it was probably around 6:30, so most employees had left. When I was walking to my car in the parking lot, a couple of trucks went very close to me revving their engines again in an effort to intimidate me – I kept on walking looking down at my phone.

By Saturday of that week (10/28/25) I was convinced that I needed to go to the police station and lodge a formal complaint as the situation was only intensifying. I got to the police station and lodged a formal complaint with officer Kenneth Shank and gave my account of the situation and said that I thought that my life was at risk. I also told him that I suspected Karen Kloss (Fitness Center manager) to be the main person behind these intimidating actions.

Officer Shank asked me what I wanted him to do which I thought was a little odd for a police officer to ask when I had already briefed him of the situation and my concerns about my life being at risk. I put the ball back on his court and asked him what he would recommend. He said let's watch and see if it continues and if it does, to take next steps. Even though I was very surprised about his suggestion to wait and see, in spite of me telling him that my life was at risk, I agreed because I somehow felt a sense of safety and left the police station. When I got near the new round-about in Hummelstown/ Hershey suddenly I noticed this car appeared very fast from behind and stopped maybe a few inches short of mine and had a phone with a bright flash on the

dashboard to scare me and then quickly turned to the right lane that connects to Middle town road and vanished.

Next day (Sunday) morning when I left my home to run some errands, again an act of intimidation occurred very close to my home.

Normally, I would've first informed my immediate manager, Kyle Shank first of these concerns but he was out at a Conference that week (hence the reason I went to the police station first). Once my manager returned to work (he works remotely from Maine) I mentioned this episode to him and he immediately asked if the retirees were white, I said yes, and then his reaction was that with the elections coming up that this might have been a racist move etc. etc. and that he will inform the HR business partner. I also then got convinced that this might be a racist driven incident but little did I know at the time that my manager was also heavily involved in this plot. Since the gym manager had many friends in HR, I was concerned that I may not get an impartial review by HR. I sent my complaint to HR as requested to release the original/unedited video footage but it was rejected saying an objective investigation was conducted and they did not find anything to support my case. I had even offered to pay out of my personal funds for video footage un-archival efforts but to no avail.

I also felt that the followers were location tracking me and wanted to confirm it. Since they were following me, from home to office/gym and back, one Friday, I worked remotely from home in the morning, then close to lunch time, I decided to wear my gym clothes on the pretext of going to the gym and left home. Since they were monitoring all my movements and following me, I went a little bit towards my office and then did a sharp swerve as I neared the local highway (to trick them) and sped to Wegman's Grocery store instead which was 20 minutes away and guess what, after a while they appeared there as well. That was the day that I confirmed that they were location monitoring me as well.

There was a major feedback loop from my home to the company as the local Derry Township Police Department and FBI were involved and they had cameras all over my house including my bathroom. Information was getting relayed from my house to the company and they set up traps/conversations accordingly.

2018 onwards:

All of the events that happened from 2018 leading up to the time I involuntarily resigned is important context as to how everything unfolded over time, which now makes sense in hindsight.

Looking back, this all started back in 2018. There was a corporate wide downsizing effort of significant scale in 2018. As a result of that, I got transferred to the company's media team, reporting to the head of the media team at the time, Charlie Chappell. Due to the downsizing and some natural attrition immediately following that, I was

tasked with solely handling the work that used to be done by 3-4 people without any increase in my base salary (besides the typical merit based & COLA pay increases). In addition to doing the work of 3-4 people, my responsibilities also increased over time with the company's foray into the complicated retail media space as well as inclusion of Salty brands but I never asked for a promotion or a raise.

In late 2018 (or 2019), Yuan Sheu was hired as a data scientist to our team. He was the main character/information gatherer/mole that the company/FBI planted in this master plot orchestrated against me.

He used to work at a company called JetSmarter. He said FBI had interviewed him about some shady dealings that happened in that company (before he joined Hershey) and said they want to talk to him again. After he talked with them, when I asked why they wanted to talk to him again, he was not very forthcoming with information which makes sense now. I believe this is when the company/police/FBI might have briefed him on how to play his part in this very sophisticated plot.

Initially, when he joined we didn't necessarily gel well as he used to degrade MMM & the type of statistical modeling work I used to do and call it "bull shit" but then he gradually started confiding in me about how other employees were treating him etc. etc. and started to seek advice. I do recall him taking me into a room and saying something negative about Rachel Benson (another colleague of ours) but little did I know that this was all a part of a set up to gain my trust in him. 2. Yuan: When the founder of one of our media partners, "Kargo" came into office to talk analytics, Yuan shouted at the top of his voice that the type of work I do (MMM) is absolute bullshit.

To put it mildly, Yuan behaved in a pretty extreme & obnoxious fashion quite often but no one seemed to care and if anything, they made a joke out of his behavior. It was very much accepted that it was alright for him to behave that way and call bull shit on what everyone did. I found this very surprising but just went with the flow like everyone did. In fact, even when we interviewed him for the job, some of this personality of his came through so much so that Charlie Chappell came to my cube and said "he's something" but despite that, the decision was made to hire him. Bob Carl, Charlie Chappell, Dan Mohnshine and I interviewed him. He used to literally call "Bull shit" on pretty much anything and everything that anyone did, or said in a meeting, but it was ACCEPTED as Yuan being Yuan even though the mandatory trainings that the company had us take used to advocate that kind of behavior was frowned upon. I found it very surprising that the company tolerated it.

He would not help most folks on our team even though he was sort of in a support role for our integrated media team. He'd say that they need to know how to do it themselves and it's a waste of his time etc. and would constantly complain. He used to tell Bruce Knowles, Damian Mahaffey and me, that if he had the power to do so, he'd fire pretty much everyone except a couple on the Integrated Media Team which I thought was a pretty strong statement to make. Once he even said this in the presence of Vinny Rinaldi as well, who by then had become the Director, overseeing

the media team. To my surprise, Vinny too endorsed/acknowledged and said something to the effect of 'yes, major overhauls will be done to ways of working for the Integrated Media team where they'd need to take more responsibility'. Yuan used to say extremely politically incorrect things most of the time but somehow it was accepted that it was just Yuan being Yuan.

Yuan sometimes used to yell at the top of his voice to folks he worked with. Little did I know at the time that this was all staged.

Everyone was aware of these actions of his, including management but however it seemed okay for some reason.

This went on till I resigned. If I or anyone else behaved like that we would've been out the door in no time.

Without exaggeration, Yuan hardly worked (easily less than 25% a day) and then remainder of the day was spent walking the hall ways/corridors in the company, openly reading math books unrelated to work, taking lots of breaks/getting coffee, going for long walks after lunch. He also used to start the weekend early EVERY Friday (leaving office around 12 or 1pm every Friday). He'd also quite often walk towards the area where HR folks sat which was in the far end of the 3rd floor from where we were seated. Sometimes he'd say that he's going to talk to his good buddy David Smith in HR Analytics. Looking back this was his way of interacting with HR team behind my back.

Essentially, the company wanted to normalize such behavior so that I'd follow the same and then they could fault me.

Additionally, some time during 2018/19 for almost 10-12 months, my manager did not schedule any routine/recurring weekly or bi-weekly meetings with me even though he scheduled these meetings with the rest of his direct reports. I could understand if he missed a couple, but to not have one for such a long time was a surprise to me. I did not raise any of this with my manager or HR at the time due to fear of retaliation as I've always felt like the underdog/indentured servant who had to work more/harder compared to my counterparts to justify my position. I did however mention it to my colleague Yuan and said may be it's a sign of what's to come in terms of potential job displacement for me. Since Yuan and I were of similar age demo, we used to chat often about lay offs and companies in general leaning towards hiring younger folks vs older ones like us.

In 2018/19, Yuan comes and tells me that he spoke with Jason Beers in HR Analytics and that he had said Senior Managers without any direct reports are the most at risk to lose their jobs. I was a senior manager with no direct report at the time. At the time I told him - that's okay, I'll stay till I am chased out and didn't realize that this was part of wider company plot to get me to resign on my own.

Additionally, during a Xmas party that Charlie Chappell hosted in 2018 (or 2019) at his home as well as a

socially distanced get together he hosted for the media team in his backyard during COVID, some of the actions/comments made by his wife and him seemed very odd but I dismissed it. Can provide details if necessary.

Back in 2018/19 two of my colleagues, Melanie Myers (& Ashley Carlisle), were asking me whom I thought was cute and who my crushes in the company were, which I thought was a little odd but they were very friendly and nice to me in general, so I didn't read too much into it. In order to get me to blurt some names, they said who their crushes were - Will Lisman was mentioned as one. Melanie also mentioned that she had seen Virtual Reality (their nick name for Vinny Rinaldi) in her dreams etc. etc. I said I don't have any crushes in the company but named a couple of celebrities I liked. The plan was to get me to say some names of colleagues and then honey trap me using them.

In 2019 April, my mother fell critically ill while vacationing in Morocco - since I was the only one in our family who was able to go right away without the need of a visa, I told my manager Charlie Chappell of the situation and the need to go and be with her. To my surprise, based on his questioning and facial expressions it was very clear that he didn't support it but I had to do what I had to do, so I decided to go for 1 week but assured him that I will get caught up with work as much as I can while I am there (so as to minimize disruption to work).

When I returned no one on the team asked how she was doing etc. Some even asked me where I had been, as odd as it was I didn't really read too much into it at the time.

I was once invited to a meeting with Charlie Chappell, my ex-manager (Emilie Thomas), Regis Kegel (a manager who was in Finance at the time but had done similar work to mine in a prior job), Jason Brockman (Snr. Mgr. Finance). What I thought was going to be like any other meeting ended up with Regis grilling me pretty harshly on how I do the ROI measurement and questioning/challenging if I was applying the right transformations etc. in the models. Then he wanted access to all the tools etc. that I was using even though he was in Finance which my manager Charlie seemed okay with. At the time I just brushed it off thinking it was Regis's personality. Then Charlie Chappell eventually hired Regis to the media team to assist with analytics which I think was a move to scare me or with the intention of eventually replacing me.

Another incident that comes to mind with the recent incidents of trying to trap/bait me and make me look like a thief is, back in 2018 or 2019, Vinny Rinaldi (Snr. manager media then) who used to sit next to the cube beside me said his air pods that were on his desk were missing which I thought was odd. He insisted that he had placed it on there (in other words suggesting that someone might have taken it from there). Then Mark (I don't know his last name), the maintenance/facilities guy comes over and tells me something to the effect of 'we have cameras hidden all over inside the walls/pipes etc. and can check to see who took them and place more cameras if necessary', said in a way to scare me and alluding that I might have taken it, which I thought was very odd to say to me but then again I didn't read too much into it at the time. Interestingly that day many others including Melanie was out of office.

Vinny also used to complain a lot about his family. Especially his wife and mother-in-law.

That his wife slept throughout an entire long drive from upstate NY to Hershey. I also generally used to fall asleep when my ex-husband was driving (especially at night time after a function/get together) and he used to complain saying I should be up, supporting him and that his sister never sleeps when his brother-in-law drives, instead she stays awake to give him support etc. etc.

He used to say that his mother-in-law gets into everybody's business. She had apparently broken her leg when she had gone to see Vinny's new home construction site without him or his wife being aware.

He also mentioned how his grandfather had bad morals and cheated.

In 2019 September I developed an extremely bad cough (after a trip to NYC during labor day weekend) that lasted seven weeks despite taking 3 different dosages of antibiotics. This was prior to working remotely became the norm. So, When I fell sick initially, I informed Charlie Chappell about it and said I would like to work from home for a couple of days. He was nice about it and said sure. Since my cough persisted and had gotten worse, I reached out to him again via a teams message and said that I'd like to continue working remotely but this time I got the sense that he wasn't in favor of it. So, I started coming into work despite my very bad cough. My colleagues and even Ryan Riess commented about it. One colleague, Isaac Chernin, who couldn't bear to hear me cough, brought and gave me some cough meds he said was very effective.

Amy Good who was hired as a director of media during COVID had an event at her house for Fall pumpkin painting. When I went to serve food a couple of times, she would come and sort of supervise making me very uncomfortable. She would hold meetings with me to discuss MMM and challenge the findings and use of MMM quite a bit.

During COVID, the company conducted a drive-thru flu vaccine clinic. When I went to the drive through

I was directed to a specific lane to drive thru. When I went to that lane, the nurse who administered the vaccine seemed rather unfriendly and jabbed the vaccine in a very odd/hard way. I developed a pain in that arm which lasted for more than 8 months and I couldn't raise that arm past a certain point for a long time.

When I went for my annual physical exam, I mentioned this to the doctor, she said she could administer some medicines (steroids I believe) but interestingly I noticed that she had not documented that in the visit summary.

Below are some statements made by my colleagues/management to get me to participate and say negative things.

1. Yuan saying "Charlie Chappell is a bull shitter and even Bruce thinks the same. He promoted Regis to senior manager before Bruce etc. etc" - this was said very loudly in the presence of David Smith in HR and surprisingly David Smith was just smiling. Sadly, David whom I had really respected as a genuine person was involved too.
 2. Yuan telling Vinny that if he were in charge, he would have fired the entire Integrated Media Team as they don't do any work
 3. Yuan telling me Bruce had confided in him that Kyle is the worst manager he's ever had in his entire career
 4. Yuan telling me, "Do you know why the company will never appoint Kristen Riggs (CGO) as the CEO. It's because she's too fat and her appearance will not bode well for a company that sells Chocolate"
 5. Kyle: Kyle Shank saying Ed Edson is a Jerk at a dinner hosted by the Google team at Devon Seafood Grill.
 6. Bruce Knowles and Damian Mahaffey making many derogatory comments about Kyle Shank. I also contributed to these conversations sometimes expressing my frustrations on how Kyle handled some things but there were instances where I also defended Kyle. For example when Yuan used to run down Kyle saying he only has an Online masters in Analytics and is bull shitting with his analytic work etc. etc. I defended Kyle, not knowing that these were all traps.
 7. Bruce Knowles saying Vinny Rinaldi worked his way in to getting promoted to VP position by whining that he was not getting heard/respected as a director.
 8. Yuan saying that Kyle and Vinny go after every new shiny penny instead of focusing on more important things..I also contributed to this.
 9. Stephanie Hemman asking me what I thought of Kyle Shank showing she was frustrated.
- I thought that folks were getting frustrated with how Kyle Shank and Vinny Rinaldi were handling certain things but this was all staged to get me to react in negative ways.
10. Kevin McCollum saying that Michelle Buck wanted a heated walking path leading up to the C-Suite building and spent \$1MM which was not fiscally responsible (he's in procurement). He also said, the some C-suite members insist on catering food from expensive/high end places when they travel in the corporate jet (instead of getting something like Panera).
 11. Vinny Rinaldi saying during a business trip that all of the C-suite executives aboard the company jet was not talking to each other and that it was so dysfunctional....and

that the tension between Chuck Raup (then President, North America) and Kristen Riggs (CGO) was very evident.

12. While I was in the Sauna, the gym manager (Karen Kloss) saying that Chris Scalia (CHRO) was the one who wanted a sauna built in the gym but when she requested budget for towel service for it, that it was rejected. She also mentioned that another executive wanted the 'climbing rock' installed.
13. After a pickle ball league game offered by the company gym, my opponent, Tim Thomas, asked me how long I've been with the company. Then he started ranting that he's been with the company for 30+ years and how the company has gone down hill after Michelle Buck took over as the CEO etc. He went on and on for 15-20 minutes. Again, this was a part of the set up too to get me to say negative things about leadership.
14. Melanie Myers and Vinny Rinaldi talking something negative about Rachel Benson in my presence which I don't recall but it was not long after she had joined the company.
15. Melanie Myers and Vinny Rinaldi also talking about Mike Nolan getting UM (our media agency at the time) to do all his work. Kyle Shank saying he was doing Mike Nolan's work in addition to his own.
16. Rachel Benson complaining about Melanie Myers during a call with me during COVID. We used to joke that Melanie was the biggest diva on our team.
17. Yuan constantly bashing and complaining about Regis Kegel and Miranda Maverick to everybody including Vinny Rinaldi and Kyle Shank (when they got promoted to Director and above).
18. Yuan telling that he couldn't stand the sight of the short haired black woman who appears in most of the mandatory training videos on Hershey's LMS (Learning Management System). This was a ploy to get me to say something negative about African Americans.
19. Yuan and Bruce hating on Regis and Miranda and constantly putting them down. I believe this was a part of the whole plot too.
20. Vinny Rinaldi saying Kristen Riggs (CGO) had told him that Charlie Chappell was not a proactive leader who got ahead in the media space.
21. Mike Nolan saying Yuan does not do any work.
22. Rachel Benson saying Vinny Rinaldi didn't take her feedback in to account in terms of her growth aspirations

Once Melanie Myers was very keen for me to join a team Happy Hour that was happening at Iron Hill. I was planning to go but was getting late because I went home to drop off some food for my kids dinner. She kept texting me if I was joining etc. Once I went there and joined the folks (Melanie, Liz Russ, Jordan Witmer, Allison Dobstetter, Miranda Grier etc) during the conversation Melanie asked me what I thought of Charlie as my manager which I thought was a little odd. Again to get me to say something negative...

Essentially, folks were planted/assigned to run down the senior management, management and other colleagues in my presence, so I would do the same and then they could fault me for it.

The goal was to earn my trust/confidence, and then have me say or do wrong things so they could then fault me or make me feel uncomfortable.

I'd say I was known for saying things as they are. While I have been commended by some employees/colleagues for keeping them honest. I refused to kiss-ass like some employees did and said things as they were, even though it may not have been the most politically correct thing to say sometimes.

Early last year or in 2023, Yuan asked me if I'd want to go down to the cocktail/happy hour in the atrium.

I said sure and we went down to the atrium.

We ran into Chris Scalia (CHRO) and interestingly Yuan already knew him (usually he tells me about pretty much everyone and anyone he's interacted with, especially higher level folks but he never mentioned that he knew Chris).

Yuan introduced me to him and Chris's response was very surprising coming from the CHRO in that he had a very unfriendly (sort of sour like) facial response towards me and just acknowledged without saying anything. I was disheartened to say the least but just attributed it to him not liking brown colored folks (Indians/South Asians) like some other employees in the company.

Vero Villasenor - she used to be very friendly and placed a lot of trust in the MMM work I did on the brands she managed when she was a brand manager. She then became VP/GM. I felt that she became very distant and didn't want to interact with me any more. I believe she might have been told to do so because I truly respected her and we had a great rapport.

Lynn Hemans - she joined the company new as a SVP. Kevin McCollum and I had a call with her to talk about MMM and her first question was "why do we do MMM in the first place"?

Mike Peiffer, another employee whose cube is in the same area as mine, would peep through his computer screens any time I went to get some stationary or a band aid or the wipes to clean my desk

and stared as if I was stealing something which made me very uncomfortable.

Jennifer Utterback, she's the admin for the media team, once I asked her for something and she went to the stationary cabinet and made a comment to the effect that stationary disappears very quickly. I told her to put a camera.

Yuan used to come running to me often saying, Rajika there's free food outside this conference room, and that conference room etc. There's cookies in the kitchen. Again, this was a trap.

It was no secret that I liked to eat free food that was left in the kitchen by where we sat or in other galleys. When some vendors come to town to do business, they order breakfast/lunch etc. and any leftovers are kept in the kitchen for folks to eat. Sometimes, an email is also sent saying there's leftover food in such and such a place. On some occasions, I would also take some leftover food home if it was still sitting on the office kitchen counter top after work hours as janitors would just toss it in the trash anyways. I would openly tell my colleagues or they would even see it but I was made to feel very uncomfortable by Jennifer Utterback and Anna Lingeris whenever I served any food from there they'd come over quickly and keep staring.

Another time, Stephanie Hemmann texted me asking if I could put the leftover Chipotle food in the fridge as she was held up in a meeting or had to go home early. I said sure and around 5pm went in to the kitchen area to put the food in the fridge. Anna Lingeris quickly comes running with her phone face-timing Jennifer Utterback to show what I was doing. I realized that this was a major set up to make me feel uncomfortable.

Due to Hershey's 'best of both' work policy, most employees came into work on Tuesday thru Thursday.

Yuan and I used to show up on all 5 days a week for the most part. So, Mondays and Fridays were pretty quiet with hardly any people in the office. But then Regis Kegel and Alyssa Marsh suddenly started to show up on Fridays. They used to go out to lunch very often. Regis brought bagels to celebrate Alyssa's birthday and again 2 weeks later as a farewell treat. He's never brought any before when he had another direct report. I thought it was odd that he'd bring these on Fridays when nobody was around. Interestingly, he used to keep the bagels on the cabinet right near my desk and then leave. I ate some but again this was a trap for me to take more.

Another Friday Rachel Benson and Stephanie Hemmann showed up to work and said that some media partner (that was not local) that we work with, had sent cupcakes to Stephanie Hemmann. Interestingly it was from a bakery that was near where Rachel Benson lives which is about 30-40 minutes from Hershey. Stephanie offered cup cakes to us, I took one and I believe Yuan might have taken one as well. Stephanie and Rachel both leave office early and the cupcakes were still sitting at Stephanie's desk which I thought was odd because I was the only one left. I took one cupcake to take for my son and put the rest in the fridge in the office kitchen and fortunately I

messed Stephanie and let her know that. These were all traps to make me take food and call me a thief.

It was also no secret that I loved free swag that our vendor partners like Meta, Tik Tok, Google etc. used to bring when they visited.

If there was swag lying around in the media team area I would take and everybody else did too, but there were instances where I might have taken more than my fair share. If there were water bottles, I would take because my kids used to lose their water bottles very often at school/sports.

With my personal challenges of going through a very bitter divorce and when I realized that my husband was taking advantage of me, certain things got neglected in my home. Mainly, on the cleaning side.

So, sometimes there was food strewn on the counters which I wouldn't wipe down on a daily basis. I didn't change out the trash bag daily.

The trash in my trash can at my office desk was also not removed for many days at a time.

Regis's desk was made to look messy with food/snacks strewn all over and Vinny left a message saying rats might infest.

Since there was a feedback loop from my home to office, these were set ups.

There were many Facebook posts appearing in my feed that seemed very creepy as the posts seemed very intrusive and personal to my situation. A couple of times, I had said something at work and soon enough a post related to what I said appeared. I had told this to Bruce and he gave a very weird smile.

After I involuntarily left the company so many targeted display/video ads were served to me on YouTube and Facebook with colors of my sneakers I used to wear to the gym as the color theme (pink and blue).

Knowing about my liking for swag and food, the company staged many traps to lure and bait me with the intention of potentially faulting me for it.

In late Dec 2023/early 2024 I started going to the company gym to workout. Stephanie Hemmann, my colleague whom I thought was my friend and happened to live in the neighboring subdivision (of my old address), joined me as well.

In addition to all of the above, several honey traps were also set up to lure, bait and trap me (because my ex-husband spread that I was of not good morals).

1. Regis Kegel - one Friday afternoon when no one was around, he crouched down near my desk and started touching my shoe. May be him asking me to become his

pickleball doubles partner was also a trap of some sorts but that obviously didn't work out. Regis also used to fist bump a lot for no reason which I thought was odd.

2. Damian Mahaffey - looked down below my waist (pant/zipper area), when I was teaching him some stuff on MMM in a conference room. This made me quite uncomfortable but I pretended not to notice and went on with my MMM conversation.
3. Tulsi Tarindi - I use the rest room fairly often at least once every hour. Around August/September I noticed this Indian guy who works in the IS area close to the rest rooms always looking at me in a strange way when I was going to or coming out of the restroom. Then I got a LinkedIn invitation from him soon after which I thought was odd but makes sense now because my ex used to spread that I am into Indians and Pakistanis.
4. Gabriel Fitser - This was by far the most well orchestrated honey trap (or rather plot) where they had Gabriel Fitser make advances towards me in multiple ways in-person in the gym as well as via phone/WhatsApp messages under pseudo names. I must admit that I too partially ate the bait here and reacted/responded in certain ways but towards the end of my tenure I started realizing that something didn't add up. He was a personal trainer who was employed by NIFS but onsite at Hershey's. He along with the gym manager, Karen Kloss (also employed by NIFS) were the main actors in this extremely well choreographed plot but they were instructed to carry it out under the orders from highest of the highest in the company (Michelle Buck, Chris Scalia etc.). Again to help my ex-husband.

Essentially every class I attended in the gym was STAGED in some fashion or form to make the honey trap look extremely realistic and entice me to participate. To put it simply, Gabe was supposed to show/act his interest towards me and Karen was supposed to act as if she suspected something between the two of us and act accordingly.

In addition to the in-person advances, he also played songs such as Phil Collins song "Sussudio" and "Don't lose my number" and many others to "communicate" and lure me...

When I called his number he did not like it though which I attributed to him not wanting his manager to find out (as I did not know at the time that it was a honey trap).

I must admit that I audio recorded the songs but subsequently deleted. Additionally, I must admit to giving a little piece of paper to him which I did not want to admit to the company when I filed my complaint with HR as I did not want HR to digress from the issue at hand.

Since I was older I alluded to my age one day....in the next class Maroon 5's "Move like Jagger" is played.

In his WhatsApp messages he also lied about his age to me.

Additionally,

If I wore a chain with my buddhist emblem pendant, next fitness class he would wear a big chain with a big cross.

If I wore band-aids for some shaving cuts on my legs next fitness class he would also have a wound with a band aid/dressing on him.

During circuit training classes he would look at below my waist area in ways that I felt pretty uncomfortable.

Interestingly (due to the feedback loop) things associated with my home/car was also mirrored or mentioned in the gym.

I had a buddhist emblem hanging from my rear view mirror. Next thing you know, he also has a christian holy water bottle hanging in his car.

I had a sun-shade to cover my car windscreen and sure enough he also gets one.

The choice of some of the songs played in the fitness classes were beyond inappropriate in terms of the lyrics for a corporate gym but no one seemed bothered about it (because everyone else besides me knew that it was staged). Some songs were about prostitutes/whores etc. Again, since my ex had spread word that I was of bad morals this is one way they played it out in the gym.

"Hot In Herre" by Nelly. Gabriel used to say that Karen Kloss (gym manager) plays this in one of her classes (that I didn't take).

"Rock You Like A Hurricane" by Scorpions "Numb/
Encore Lyrics (feat. Linkin Park)" by Jay-Z "Red
Dress" by Sting

"Rebel Yell" by Billy Idol

"Redlight" - by Sting and Swedish House Mafia

"Numb" by Linkin Park

"Baby Don't Hurt Me"-by Anne-Marie, Coi Leray, and David Guetta

"Round and Round" by Ratt

"Shame Shame Shame" by Ratt

There's many many more which I don't recall off the top of my head but should be captured in video/audio footage from the fitness center which the company refused to release.

I love Tennis and used to play when I was young. One day after a class he mentions that when he used to play tennis in high school and that he fractured something.

I bought Mahi Mahi to cook at home, in the next gym class some story is concocted about him liking only Mahi Mahi fish as a seafood option.

I used to go to a close by local thrift store to buy some clothes...in the next spin class he blurts out of no where saying 'cheap'. In another class he says "electricity bills are so high" and points to the spin bike I am riding which powers a fan attached to it when it's cycled without electricity.

When I returned in June 2024 from a vacation in Sri Lanka and wore a Sri Lanka t-shirt, in the next class "La Isla Bonita" is played as Sri Lanka is an Island.

Essentially, there was a major feedback loop from my home to the company. Hidden cameras were placed in my home including my bathroom.

With the feedback loop from my home to the company, many things were done in the women's locker room in the gym too. Here are a few...

1. Like I said many things were neglected in my home front during my bitter divorce including the state of my bathroom at home. There were clumps of hair stuck on the wall which I didn't necessarily remove often. Guess what! I used to shower only in the big shower cubicle in the gym. One day when I had just finished showering, Ramona Marlin comes and asks me 'Rajika, did you see the hair stuck on the shower cubicle wall. It's gross and that she's going to let the gym manager (Karen Kloss) about it.
2. Based on my bathroom habits, Diana Dodds comes and tells another lady in the locker room how she has incontinence problems.
3. I used to tell my colleagues (Yuan Sheu, Bruce Knowles, Damian Mahaffey, Rachel Benson etc.) that I might be at higher risk in terms of job displacement in the upcoming re-org in September/October, since I've been with the company for quite a long time and also considering that I am of a higher age demo (vs. others on the team). Diana Dodds comes near me in the locker room and says that her husband is fearing that he might lose his job because he's been with the company for long, age demo and upper end of the salary range.
4. Tammy Barry says "he's a cutie" to Carol referring to Gabriel Fitser in my presence in the locker room.

Stephanie Hemmann and Alyssa Marsh from the media team were basically "assigned" to be my gym buddies and confidantes in this cleverly executed plot in the fitness center and they played their part very well but towards the end I realized that Stephanie was just playing a part and I let her know that I knew it.

In 2024, Interestingly (but not surprising in hindsight), the video for the media team skit which is presented at the annual offsite sales conference was recorded in the gym (based on some movie theme that I don't recall). I also had a few small parts in it. Brad Cutler who wrote the script for the skit said he had to re-write the skit last minute to base it on the gym theme (which makes sense in hindsight too). Then Brad Cutler strangely shares a picture of me and Alison Martin from the gym recording (but I was the focus) copying Ed Edson, Vinny Rinaldi, Jen Glass (the new media director) and Alison which I thought was extremely odd.

Interestingly, the day after Halloween, Vinny Rinaldi (Head of the media team) posted a picture of him and his wife in their Halloween costumes on the media team's MS Teams chat thread and co-incidentally his wife was in gym clothes dressed as a gym instructor wearing a whistle around her neck...

5. Jack Wilder and Eric Bowers saying that I am one of their top 5 favorite Hershey employees was also part of the plot

The honey trap in the gym should be all caught on original/unedited video footage of the gym including the 2 classrooms.

The CEO, Michelle Buck used to be present in the gym at times too but the reason the company refused to release the video footage was because everything was caught on Video.

All of the communications including MS Teams etc. should reveal this mass scale plot.

The company used my next door neighbor Kamy Devaguptapu who is also a Hershey employee in this plot.

She told me she was promoted to an off-shore assignment after I left.

To further intimidate me, the company had folks from the Manada Electrical company pretend to install things near my cube and above my desk but now I know that the cameras were on me well before that for a long period of time.

They also pushed Yuan to learn Marketing Mix Modeling (MMM) and report into me for one year.

Towards late 2023 my manager told me (right before a leadership survey was going to be served) that he will make sure that I get a very good performance rating for all my hard work in 2023. While I was doing 3-4 employees work since the 2018 company re-org., I also got added responsibilities of working on Salty brands as well as the ever expanding and highly complex retailer media measurement. But when it came to the actual performance discussion in early 2024, I was told that he gave me a superior performance rating but his leadership (Vinny/Ed) pushed it down and there was nothing he could do about it. To normalize it, he said even his performance rating was pushed down.

Towards end of 2023 and in 2024, I also noticed that my manager was starting to take my work away from me and he used to do it even though I was quite capable of doing it myself. He would do the work and then ask me to give it a second set of eyes or provide my opinion on his analysis. I found this very de-motivating but kept quiet but believe that this was again a way to get me to leave the company on my own accord.

I learnt about future plans for the MMM work I was responsible for, from my colleagues first. For example: that MMM will be on a monthly cadence once it was in-housed. Jen Glass, the IMT director even joked in the presence of Bruce and a couple of others saying something to the effect of 'don't tell Rajika what we heard about MMM...she'll freak out'. There were many other instances where things about my work was first shared with my colleagues before sharing with me.

I believe a lot of things were done in late 2023/2024 to frustrate me. There was also major confusion on who was responsible for what between analytics & the IMT team. A request was made for a RACI but was not received.

The company hired Amit Chillar despite a hiring freeze in early 2024. Kyle Shank (head of analytics) used to say different things to different folks on what Amit's responsibilities would be. One time, I was told he'd be working with Bruce, another time with Yuan on

the data strategy, and then another time I was told that he'd be assisting me in MMM work including the in-housing efforts. Even though Amit was an Analytics Director specializing in MMM at Nielsen he and my manager, Kyle asked me to teach him MMM and allow him to shadow my work which I found to be very interesting. I believe Amit was hired to replace me as they were making every effort to get me to resign on my own.

Bruce Knowles showed that he was not happy about Amit being hired as a Senior manager at a much higher pay scale from outside. He also said he was assigned as Amit's "buddy" to guide him as a new employee but he will not go out of his way to help and will do the bare minimum. This was part of the set up as well.

Yuan came to me one time and said Amit asked him to show him how to do some work and that he refused. Amit then calls me and says he needs my advise and tells about Yuan's attitude towards him of not helping. All of this was again staged to see my reaction.

My management said they were going to hire someone to help me in my work and said they got approval for a position which was not true. There was no open rec in the system once the new org got posted in the system.

Soon after I involuntarily resigned, HR and Kyle shared a posting to hire a Director of Analytics for the team on LinkedIn which was NEVER part of the plan and was not shared pre or post company re-organization.

Yuan and I used to discuss about the impending layoffs/job cuts often. Since we were towards the older of the demos, we both were more sensitive about it (at least he pretended to be sensitive about it). I had confided in Yuan that a lot of praise closer to re-org date could also mean it's not a good sign. This was based on what I had observed in a previous company (but happened to someone else). I did notice a lot of praise via emails etc.

They also had Chuck Raup (SVP) come and be in the pizza line to get the free slice of pizza, that the company cafeteria offered on Wednesdays. Since I was being positioned as a very cheap person, others mimicked this behavior. Yuan did it the most. One time Yuan shares an unsolicited picture of his lunch plate with me and Regis on MS Teams chat showing a small mound of rice and 3 shrimps. I was being positioned as a 'very cheap' person by my ex. So, part of Yuan's assignment was to project a very cheap personality so I would relate to him.

The company did a big downsizing effort in September of 2024 and could've easily let me go.

I used to tell Yuan, Bruce etc. that I'd rather take the severance package if I were to lose my job vs. me resigning.

When I came back to the USA in early October after my family emergency last year, I was told that Mike Nolan who is a best friend of Vinny Rinaldi, the head of the media team, was affected by the re-org and since it was performance related that he wasn't eligible to apply for other open positions in the company.

Mike had already cleaned out his desk and left a little farewell note on my desk. The end date for everyone affected by the re-org was end of October (24th I believe). Surprisingly, I saw Mike Nolan's MS Team status still turned ON after October even though he had officially left and his work had already supposedly transitioned to Kara Farnham. There was also no farewell email for him nor a farewell lunch of any kind. I believe this was another ploy on the part of the company - his LinkedIn shows that his last date was in January 2025. I won't be surprised if he's still on the company payroll.

Yuan goes down to eat lunch sharp at 11:30am everyday. There was a time when I used to join him often at the cafeteria.

While eating lunch we used to chat about many things including the stock market which I was slightly interested in but he was a big time investor.

One time, when I was eating lunch with him I noticed that some employees who were seated in a booth across from me were looking at me and laughing. They made it very obvious that they were laughing at me. I thought it was very odd but again hadn't connected the dots at the time.

Couple of times, I binge watched some Netflix/YouTube programs at home till early morning. I sent a text to my husband (pre-divorce) asking him to attend to the kids in the morning so I can get an extra 1/2 hour to 1 hour sleep. He needed to wake up kids and give them breakfast. This happened not more than 3-4 times at most.

Yuan comes and complains to me that his wife watches Korean dramas all night and does not wake up in the morning to give breakfast and see kids off to school.

Interestingly, two people who used to work with my ex also became Yuan and his wife's good friends.

The company got even the vendors to participate.

in4mation insights (i4i) - QC of deliverables was a fairly big issue with i4i. I used to inform my manager, Kyle and he was nonchalant about it. It is possible that some of the quality issues I was facing with i4i were maybe intentional to make me upset and for me to react. Additionally, i4i would take all of the simulation work off me saying its easier to do it on their side. This was company's way of slowly weaning me off of my work. They also had Dan Gogue start taking over some of this simulation work.

Google -

Once after a google hosted dinner about 1 or 2.5 years ago, the google team kept on saying to join them for drinks at Hershey Hotel. Generally, in the past I've not joined these after dinner drink sessions but that day I decided to join for a little bit.

Vinny kept on saying how Jessica Duquesne, an employee who is a divorcee was onto Bhavin (the Google lead, he was of Indian origin) at some event. The next day Mike Nolan told me that Vinny was surprised that I joined for drinks at the Hershey Hotel.

Meta - after I had submitted my resignation but before my last date, Kyle had someone at Meta (Miriam) reach out to me and extend a lunch invitation for the day after my last day with the company

Pinterest - same thing as Meta above. Had the account manager reach out to me after I had resigned (but before my last date) asking for a meet up after my last date. I've been working with her for many many years.

Kargo - Since they know I like swag, they had Jennifer Churchill (their account manager) give me a Cancer Walk t-shirt of hers and a sticker for my laptop.

I used to take candy and Salty Snacks from the conference room/kitchen close to where I was seated and stash in my drawer for my use when I needed. I was NOT the only one who did that. Sometimes I would take some home too or to eat on the way.

Sometimes on my way out of the office, I would stop in one or two of the 2 consecutively located conference rooms (close to the building exit) to grab some candy of my liking (mostly Kit Kat, breath fresheners). One day when I was going past that conference room, a lady looks at me in a weird way and throws all of the candy in the bowl to a bag in a sly manner and leaves. Then during a company wide town hall meeting in 2023 (or 2022), a skit was done by my ex-manager, Emilie Thomas and some others where an employee goes from one conference room to another to stealing candies (and those conference rooms happen to be the same two I mentioned above) and I believe they called it the candy thief. Then in October 2024, a few weeks before I resigned, the same thing happened where an employee was throwing all of the candy in the candy bowl in a sly manner while I was getting water. All of this was done to entice me in to doing the same thing, so they could fault me.

I don't remember the year, but another time Jon Oparowski (an employee) started taking stationary after hours as if to take for his personal use. I believe this was to entice me to do the same.

The goal was to gain my trust and have me confide and then use that against me. I did confide in some folks, especially Yuan and Bruce mostly. I thought Yuan and I could relate to each other more because we were both from the asian region but I didn't know that it was a plot. Bruce used to say lots of things about management but I believe it was all staged to get me also to say negative things and then perhaps use that against me.

They also started sending text messages with fake job offers (that seemed too good to be true) and also added me to multiple fake stock/investment WhatsApp groups as if its by Morgan Stanley, Citi, Robinhood, Lightman, etc. They really wanted me to

participate in these during work hours and tried their best to lure me but I did not get caught to that or the job offers. I thought the job offer texts were sent by Gabriel Fitser because he was using pseudo names but never got caught to the job offer itself. I have never entertained or responded to such texts in the past. However, I did respond to some of the texts I received during the time I got caught to the honey trap and responded to Gabriel Fitser. I verified it was him because I had asked him to play certain songs and do some things in the gym in my texts and he did those.

Mark, the facilities guy comes to me one day and asks how he can get some swag (Kit Kat Duos Socks) that were lying on Melanie's desk. Melanie wasn't in office that day... so, I told him that I will check with her when she's back. This was again staged so that I would take swag from her desk.

One time I brought home swag (a really cute bag) that Mike Nolan gave from Snapchat. In a couple of days it went missing from my home and everyone in my home denied they took it. There was a feedback loop between my ex and the company.

They also set up cameras/monitoring devices on me without notice to enable them to set up these traps.

I feel like I am re-living this unpleasant situation while trying to recall and document these events that took place but it is important for me to do so.

Sadly but true, when I say that I had the BEST and the WORST employment experience at the Hershey Company.

BEST because I learned so much about media and other practical applications from the manufacturers perspective and WORST because of what's mentioned on here.

Needless to say, this has had an extremely traumatic impact on me and I am scarred for life. I will NEVER EVER trust anyone. I've also had many health issues since then which I owe to the stress of unraveling this over the past few months. I am extremely scared, wary and nervous about doing another job due to this...I have not applied for a single job since I resigned.

This would have continued if I had not involuntarily resigned.

Essentially, my life was the toy or entertainment for them to play with.

About a year ago, I used to think to myself often and feel grateful/thankful that I somehow got through the dark period in my personal life as I was able to maintain my sanity by coming in to work even when most people didn't show up to work after lockdown was lifted. Little did I know at the time that the darkness was brewing behind my back and was yet to come.

Despite my personal challenges of being subjected to emotional abuse by my ex-husband, I never shared my personal details (including divorce) with my colleagues or management in the hopes of getting any sympathy; instead I did my work to the best of my ability.

All in all, the scale of these acts over a period of years from 2018 to 2024 was unbelievable and way over the line.

HR declined to give the findings of their investigation in writing because the whole company was involved in this dastardly act. I did save some important communications with my manager and HR and can furnish if necessary.

The company's goal was to lure/bait/trap me into doing wrongful things, and then get rid of me without a severance package.

I am very disappointed that the very company that stressed the importance of ethics/integrity and had us take mandatory trainings on such topics, violated those. In fact, after I had resigned but before my last date with the company, a director in HR (Shonya Smith) sent a message titled as 'Integrity is the importance of doing the right thing when no body is watching'. I wish the company adhered to the very same principles as well.

The very same company I found solace in, when I was going through very tough personal situations/emotional abuse in my home front ended up being my reason for my sorrow today. The level of betrayal by the company is unfathomable and I am still in a state of shock to say the least.

Anyways, my life as I knew it ended on 11/11/2024 and I don't know what tomorrow holds for me; in fact I believe that my tomorrow was robbed from me. It's been almost 6 months since I resigned but not a day passes without me reliving something that happened.

Despite all of this, I wish the very best for the Hershey Company. May it go from success to success.

In 2016 or 2017, I opted to take the Voluntary Separation Package (VSP) that the company offered during a downsizing effort. I was then asked if I could stay back and I did, so my tenure continued without taking the package.

When I involuntarily resigned last November, I asked that the company at least give me the package that they had offered to displaced employees in the September 2024 reorg but they refused that. At the time I didn't know the full extent of what had happened and the why behind the what.

I am one million percent sure that the company would've never done this to an American (especially, a Caucasian) but I was an easy target. These were unprecedented levels of subtle and obvious harassment/intimidation.

Rajika Karunanayaka

Fw: IMPORTANT FW: Thank you and follow up question?

From: Karunanayaka Rajika (rajika10_99@yahoo.com)

To: migoldstei@pa.gov

Date: Tuesday, April 29, 2025 at 11:19 AM EDT

Forwarding more email communication with the HR team.

----- Forwarded Message -----

From: R Karunanayaka <rajikakarunanayaka@gmail.com>

To: "rajika10_99@yahoo.com" <rajika10_99@yahoo.com>

Sent: Tuesday, April 29, 2025 at 11:18:25 AM EDT

Subject: Fwd: IMPORTANT FW: Thank you and follow up question?

----- Forwarded message -----

From: **Karunanayaka, Rajika** <RKarunanayaka@hersheys.com>

Date: Mon, Nov 11, 2024 at 5:07 AM

Subject: IMPORTANT FW: Thank you and follow up question?

To: rajika.karunanayaka@gmail.com <rajika.karunanayaka@gmail.com>, Karunanayaka Rajika <rajika10_99@yahoo.com>

From: Karunanayaka, Rajika

Sent: Friday, November 8, 2024 2:34 PM

To: Anderson, Krista <KGriffin@hersheys.com>

Cc: Hower, Gavin <GHower@hersheys.com>; Niceswander, Tory <TNICESWANDER@hersheys.com>

Subject: RE: Thank you and follow up question?

Thank you for your response Krista!

Again, I am saying this very respectfully, but I don't believe I've been given a fair chance here.

If a thorough and objective investigation was conducted, then the outcome wouldn't be this – I am 50000% certain.

Is there a reason why there is not a keen-ness to conduct a fair and impartial investigation?

I understand that this has been escalated etc. and appreciate it very much but if there's nothing in the video footage that's the very reason

it should be shown as proof isn't it so we can put this to bed.

I understand that I am just a very "small/insignificant" person (from a minority country that no one knows) but my request is for a fair and impartial

investigation in to this. My ask is that security, myself, someone from ER, and perhaps my manager take a look at the footage together.

I also question, let's say if some other person(s) comes out with concerns like me (or let's say, even against me), would you dismiss it like how it's being dismissed for me.

I don't believe so.

I let my manager know that I won't be surprised if the disturbing events continue or even get worse for me and there might be efforts to taint my clean records.

I know I have ruffled a lot of feathers (my English is not the greatest...so, pardon if it's not correct) and there's perhaps anger towards me (inside and outside this company).

I apologize, I didn't intend it that way...I only sought protection and a fair/impartial investigation but frustrated with how it was handled. Hence my ***(in)***voluntary resignation.

I asked for the full ***un-edited/un-interrupted footage*** for the ***entire*** gym including the 2 class rooms going back to 3, 6 or 9 months.

That way we will not be cherry picking only the footage that will favor me...it will show anything and everything right?.

Also, Did you look into the exceptions that have been made towards certain employees/their children that I had called out? Like I said I have proof for that one.

Thanks

Rajika

From: Anderson, Krista <KGriffin@hersheys.com>
Sent: Friday, November 8, 2024 11:01 AM
To: Karunanayaka, Rajika <RKarunanayaka@hersheys.com>
Cc: Hower, Gavin <GHowe@hersheys.com>; Niceswander, Tory <TNICESWANDER@hersheys.com>
Subject: Re: Thank you and follow up question?

Hello,

I understand you do not agree with the findings of our investigation, however as I stated on the call, we stand by the findings of our thorough and objective investigation. Given the nature of the concerns, this investigation has already been escalated to my leadership.

That would be the normal process if someone was dissatisfied with an investigation outcome, but again, this step has already occurred.

Thanks,

Krista Anderson (she/her)

Associate Manager, Employee Relations

717-503-3740

kgriffin@hersheys.com



From: Karunanayaka, Rajika <RKarunanayaka@hersheys.com>
Sent: Friday, November 8, 2024 9:27 AM
To: Hower, Gavin <GHower@hersheys.com>; Anderson, Krista <KGriffin@hersheys.com>
Subject: Thank you and follow up question?

Gavin and Krista,

First of all, thank you for your time to discuss my complaint and investigation.

Apologies that you ended the call abruptly because you might have thought we were done but I was still typing (sorry again for my bad voice).

The last question I was typing was what happens when the Employee does not agree with the ER/Company/Security findings?

I don't mean this in a disrespectful manner in anyway but I am 10000% sure that I can show what was going on. It was pretty obvious.

So, to not observe anything in the video footage comes as a complete surprise to me.

Thank you and sorry again for the poor voice situation.

Rajika

CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

Submitted by: Rajika Karunanayaka

Signature: Rajika Karunanayaka

Name: Rajika Karunanayaka

Attorney No. (if applicable): __NA__